

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                          |   |                           |
|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA | ) |                           |
|                          | ) | No. 16 CR 734             |
| v.                       | ) |                           |
|                          | ) | Hon. Rebecca R. Pallmeyer |
| FLOYD O'HARA             | ) |                           |

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF SUPERVISED  
RELEASE**

Defendant FLOYD O'HARA, by the Federal Defender Program and its attorney SEEMA AHMAD, respectfully submits the instant unopposed motion to modify his conditions of supervised release to allow him to travel to the Philippines to see his dying mother-in-law. In support of this motion, Mr. O'Hara states the following:

1. On November 3, 2016, a 4-count indictment was filed charging Mr. O'Hara with possession of child pornography, theft of government property, and destruction of evidence (two counts). (Docket No 1.)
2. Undersigned defense counsel did not represent him at the time, but the docket reflects that on March 8, 2018, Mr. O'Hara pled guilty pursuant to a plea declaration to altering a hard drive of a computer with the intent to impair its integrity for use in a prosecution for possession of child pornography. (Docket No. 58.)
3. On December 21, 2018, Mr. O'Hara was sentenced to 38 months in custody and three years of supervised release. (Docket No. 84.)
4. Mr. O'Hara was given a self-surrender date of January 25, 2019 which was then

extended to March 1, 2019. (*Id.*; Dkt. No. 89.)

5. The docket also suggests that Mr. O'Hara did well while on pretrial release because there are a number of bond modifications allowing him to travel and there do not appear to be any pretrial bond violation.
6. The BOP inmate locator website indicates that Mr. O'Hara was released from BOP custody on October 29, 2021.
7. He is now seeking a modification of his supervised release to allow him to travel to the Philippines to visit his ailing mother-in-law.
8. Mr. Floyd's wife has gone ahead to the Philippines because her mother's health is deteriorating and she is hoping he can join her.
9. Given ticket prices, Mr. Floyd seems some flexibility in his travel dates. Therefore the defense requests an order that would allow him to go to the Philippines for 8 weeks between February and May 2022.
10. On January 25, 2022, I emailed AUSA Chester Choi and PO Jay Nichols about this request. Neither has an objection provided he provides Probation with an itinerary prior to travel.

WHEREFORE, for the foregoing reasons, Mr. O'Hara respectfully requests that this Court grant his Unopposed Motion to Modify the Conditions of Supervised Release and allow him to travel to the Philippines for an 8-week period between February and May 2022. Mr. O'Hara would be further ordered to provide Probation with his itinerary prior

to beginning his travel.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM  
John Murphy  
Executive Director

By: s/ Seema Ahmad  
Seema Ahmad  
Counsel for Floyd O'Hara

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**CERTIFICATE OF SERVICE**

The undersigned, Seema Ahmad, an attorney with the Federal Defender Program hereby certifies that in accordance with FED.R.CRIM. P. 49, FED. R. CIV. P. 5, LR5.5, and the General Order on Electronic Case Filing (ECF), the following document(s):

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was served pursuant to the district courts ECF system as to ECF filings, if any, and were sent by first-class mail/hand delivery on January 28, 2022, to counsel/parties that are non-ECF filers.

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